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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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DISTRICT OF NEW JERSEY**

IN RE MERCK & CO., INC. VYTORIN/
ZETIA SECURITIES LITIGATION

Civil Action No. 08-CV-2177 (DMC)

This Document Relates to:
ALL ACTIONS

DEFENDANTS' FIRST SET OF INTERROGATORIES DIRECTED TO PLAINTIFFS

INTERROGATORIES

INTERROGATORY NO. 1

Identify each person or entity with knowledge or information relevant to the subject matter of Plaintiffs' claims against the Defendants.

INTERROGATORY NO. 2

For each Plaintiff (a) state the amount of damages allegedly sustained as a result of Defendants' actions; (b) explain in detail how such alleged damages were calculated; and (c) state the time period over which any alleged damages that Plaintiffs seek to recover in this Action were incurred.

INTERROGATORY NO. 3

Identify any documents or sources of information on which Plaintiffs relied in making any decisions relating to their investments in Merck Stock.

INTERROGATORY NO. 4

Identify each person or entity with knowledge of the investment strategies, including investment strategies concerning investments in Merck Stock, of any Plaintiff.

INTERROGATORY NO. 5

Identify all accounts (including bank or brokerage accounts or any retirement plans) in which any Plaintiff purchased, sold or held any security, including, but not limited to Merck Stock, and identify each person or entity with knowledge of any accounts in which any Plaintiff purchased, sold or held any security, including, but not limited to, Merck Stock.

INTERROGATORY NO. 6

Identify the custodian, location and, to the extent possible, a general description of: (i) all documents relating to any security purchased, sold or held by any Plaintiff; (ii) the

account(s) in which such securities were purchased, sold or held; (iii) all documents reflecting any communications between any Plaintiff and another person or entity regarding a decision by any Plaintiff to purchase, sell or hold any security; or (iv) documents or communications relating to the investment strategy of any Plaintiff.

INTERROGATORY NO. 7

Identify each instance of alleged insider trading of Merck securities during the Purported Class Period by Defendants Clark, Yarno, and Lewent, including (i) the date of the trading; (ii) the amount of securities traded; and (iii) any documents relating to the trade in any Plaintiff's possession, custody, or control.

INTERROGATORY NO. 8

Identify each of the confidential witnesses referenced in the Complaint and set forth the specific information or knowledge relating to any of Plaintiffs' allegations that was provided by each confidential witness.

Dated: April 12, 2010

**TOMPKINS, MCGUIRE, WACHENFELD &
BARRY**

By: Wm Trousdale

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